

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

| | | |
|--|---|-------------------------|
| GABRIELLE RUIJNE, Individually and as |) | |
| Independent Administrator of the Estate of |) | |
| AMELIA CLAIRE RUIJNE, deceased |) | |
| and MARCELL RUIJNE, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | No. 3:16-cv-931-NJR-SCW |
| |) | |
| HSHS MEDICAL GROUP, INC., |) | |
| |) | |
| Defendant. |) | |

**PETITION TO APPROVE SETTLEMENT OF CAUSE OF ACTION AGAINST
DEFENDANT, HSHS MEDICAL GROUP, INC.**

NOW COMES the Petitioner, Gabrielle Ruijne, Individually, and as Independent Administrator of the Estate of AMELIA CLAIRE RUIJNE, deceased, and Marcell Ruijne, by and through her attorneys, Katzman & Sugden, LLC, respectfully request this Court to approve the settlement of all causes of action against HSHS Medical Group, Inc. on behalf of Gabrielle Ruijne, Individually, and as Independent Administrator of the Estate of Amelia Claire Ruijne, deceased, and Marcell Ruijne, and in support of their Petition states as follows:

1. That Gabrielle Ruijne is the duly appointed Independent Administrator of the Estate of Amelia Claire Ruijne, Deceased.
2. That Gabrielle Ruijne, as Independent Administrator of the Estate of Amelia Claire Ruijne, Deceased, has a cause of action against HSHS Medical Group, Inc. arising out of the alleged wrongful death of Amelia Claire Ruijne and filed a lawsuit in the Circuit Court of St. Clair County, cause number 16-L-142, which was removed to the United States District Court for the Southern District of Illinois.
3. The cause of action was brought under the Illinois Wrongful Death Act for the


wrongful death of Amelia Claire Ruijne.

4. Petitioner, Gabrielle Ruijne, Individually, has a cause of action for negligence and negligent infliction of emotional distress against HSHS Medical Group, Inc. and filed a lawsuit in the Circuit Court of St. Clair County, cause number 16-L-142, which was removed to the United States District Court for the Southern District of Illinois.
5. Petitioner, Marcell Ruijne, has a cause of action for loss of consortium against HSHS Medical Group, Inc. and filed a lawsuit in the Circuit Court of St. Clair County, cause number 16-L-142, which was removed to the United States District Court for the Southern District of Illinois.
6. There are no liens against the proceeds of the settlement.
7. A tentative agreement has been reached with the Defendant, HSHS Medical Group, Inc. for all causes of action against HSHS Medical Group, Inc. in the matter of Gabrielle Ruijne, Individually and as Independent Administrator of the Estate of Amelia Claire Ruijne, Deceased and Marcell Ruijne, v. HSHS Medical Group Inc., St. Clair County, Illinois, Civil Court #16-L-142 and removed to the United States District Court for the Southern District of Illinois and consolidated with cause number 3:16-cv-931, pending approval of the St. Clair County Probate Court.
8. The confidential terms of settlement, along with a proposed order, are being sent directly to Magistrate Judge Stephen Williams.
9. Whereupon approval of the St. Clair County Probate Court and upon receipt of all payments set forth in "Exhibit C", the Petitioners shall dismiss with prejudice the cause of action filed against Defendant, HSHS Medical Group, Inc., St. Clair County, Illinois, Civil Court #16-L-142 and removed to the United States District

Court for the Southern District of Illinois and consolidated with cause number 3:16-cv-931.

WHEREFORE, Petitioners pray that this Court grant the following relief:

1. Approve the settlement offer made on behalf of HSHS Medical Group, Inc., and their insurers pending approval of the St. Clair County Probate Court.
2. Enter an Order approving the tentative settlement reached by Gabrielle Ruijne, Individually and as Independent Administrator of the Estate of Amelia Claire Ruijne deceased, and Marcell Ruijne, with HSHS Medical Group Inc., as set forth in "Exhibit C" and pending approval of the St. Clair County Probate Court.



STEVEN E. KATZMAN #01414321
DANIEL C. KATZMAN #6306299
KATZMAN & SUGDEN, LLC
300 South Charles Street
Belleville, Illinois 62220
(618) 235-2110
(618) 235-2117 FAX

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has caused a true and correct copy of the foregoing document to be served upon the following attorneys of record in the above-entitled matter:

Kenneth Burke
Attorney at Law
525 West Main Street, Suite 200
Belleville, Illinois 62220
Email: kburke@bjpc.com

by causing the same to be sent via email on the 8th day of September, 2017.

